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VIA ECF

The Honorable Analisa Torres
United States District Judge
U.S. District Court for the Southern District of New York
500 Pearl Street, Courtroom 15D
New York, New York 10007

Re: State Farm Fire and Casualty Company, State Farm Indemnity Company, et. al. v. 57
Ann Street Realty Associates, Inc., JAJ Garage LLC, et. al.
Civil Action No.: 23 CV 06373 (AT)

Dear Judge Torres:

My firm represents the Plaintiffs in the property damage subrogation action resulting from the tragic collapse of the parking garage on Ann Street in September.

On behalf of the Plaintiffs, I respectfully request an adjournment of the initial pre-trial currently scheduled for next Friday, September 22, 2023 for approximately 60 days. This is the first request for an adjournment. Since we filed the initial complaint on behalf of State Farm in late July, we have also been engaged by Allstate with respect to its approximate 35 vehicles. My office also received additional information as to a new Defendant and today we amended our complaint adding that new Defendant and Plaintiffs and the amended complaints are going out for service today. There has been no appearance by Defendants, but I am in contact with their insurance carriers which are still in the process of confirming appointment of counsel.

Otherwise, I thank Your Honor in advance for your time and attention to this matter.

Sincerely,

COZEN O'CONNOR




Robert W. Phelan

By **November 21, 2023**, the parties shall submit their proposed case management plan and scheduling order.

SO ORDERED.

Dated: September 15, 2023
New York, New York



ANALISA TORRES
United States District Judge